

**THE ROSEN LAW FIRM, P.A.**

Phillip Kim, Esq. (PK 9384)  
Laurence M. Rosen, Esq. (LR 5733)  
275 Madison Avenue, 40<sup>th</sup> Floor  
New York, New York 10016  
Telephone: (212) 686-1060  
Fax: (212) 202-3827  
Email: pkim@rosenlegal.com  
Email: lrosen@rosenlegal.com

*[Proposed] Lead Counsel for Lead Plaintiff and Class*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ANTHONY PAUWELS, Individually and  
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

BIT DIGITAL, INC., MIN HU, and ERKE  
HUANG,

Defendants.

ZHONGXUN YANG, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

BIT DIGITAL, INC., MIN HU, and ERKE  
HUANG,

Defendants.

**CASE No.: 1:21-cv-00515-ALC**

**NOTICE OF MOTION OF ANDRE  
JOHNSON TO: (1) CONSOLIDATE  
RELATED ACTIONS; (2) APPOINT  
LEAD PLAINTIFF; AND (3)  
APPROVE LEAD PLAINTIFF'S  
SELECTION OF COUNSEL**

**CLASS ACTION**

**ORAL ARGUMENT REQUESTED**

**CASE No.: 1:21-cv-00721-ALC**

**CLASS ACTION**

[Additional caption below]

JOSEPH FRANKLIN MONKAM NITCHEU,  
individually and on behalf of all others similarly  
situated,

Plaintiff,

v.

BIT DIGITAL, INC., MIN HU, and ERKE  
HUANG,

Defendants.

**CASE No.: 1:21-cv-02262-ALC**

**CLASS ACTION**

**PLEASE TAKE NOTICE** that pursuant to Section 21D of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), Plaintiff Andre Johnson (“Movant”) hereby moves this Court, the Honorable Andrew L. Carter Jr. United States District Court Judge, on a date and at a time to be designated by the Court, for an order:

- (a) consolidating the related actions;
- (b) appointing Movant to serve as Lead Plaintiff in this action; and
- (c) approving Movant’s selection of The Rosen Law Firm, P.A. as Lead Counsel for the litigation.

In support of this Motion, Movant submits: (i) the Memorandum of Law dated March 22, 2021 (and exhibits); and (ii) a [Proposed] Order Consolidating Related Actions, Appointing Lead Plaintiff, and Approving Lead Plaintiff’s Selection of Counsel.

Dated: March 22, 2021

Respectfully submitted,

**THE ROSEN LAW FIRM, P.A.**

/s/ Phillip Kim

Phillip Kim, Esq. (PK 9384)

Laurence M. Rosen, Esq. (LR 5733)

275 Madison Avenue, 40<sup>th</sup> Floor

New York, New York 10016

Telephone: (212) 686-1060

Fax: (212) 202-3827

Email: [pkim@rosenlegal.com](mailto:pkim@rosenlegal.com)

Email: [lrosen@rosenlegal.com](mailto:lrosen@rosenlegal.com)

*[Proposed] Lead Counsel for Lead Plaintiff  
and Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 22, 2021, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/Phillip Kim